

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

PATTI H. MENDERS, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:21-cv-669-AJT-TCB
	)	
LOUDOUN COUNTY SCHOOL BOARD,	)	
	)	
Defendant.	)	

**MOTION TO DISMISS FIRST AMENDED COMPLAINT**

Defendant Loudoun County School Board (“School Board”), by counsel and pursuant to Rule 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, moves for dismissal of Plaintiffs’ First Amended Complaint for lack of subject-matter jurisdiction and for failure to state a claim upon which relief can be granted. The School Board relies on the accompanying memorandum in support of this motion.

WHEREFORE, Defendant Loudoun County School Board respectfully requests that the Court enter an Order dismissing Plaintiffs’ First Amended Complaint with prejudice and granting it such further relief as the Court may deem appropriate.

Respectfully submitted,

LOUDOUN COUNTY SCHOOL BOARD

By Counsel

/s/ Andrew P. Selman

Stacy L. Haney, Esq. (VSB 71054)  
Andrew P. Selman, Esq. (VSB 91060)  
HANEY PHINYOWATTANACHIP PLLC  
11 S. 12<sup>th</sup> Street, Suite 100B  
Richmond, VA 23219  
Tel: (804) 500-0310  
Fax: (804) 500-0309  
shaney@haneyphinyo.com  
aselman@haneyphinyo.com

Counsel for Loudoun County School Board

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of September, 2021, I have electronically filed the foregoing using the CM/ECF system, which will automatically send email notification of such filing to counsel of record as follows:

Jeffrey D. Jennings  
Daniel R. Suhr  
Reilly Stephens  
Liberty Justice Center  
208 South LaSalle Street, Suite 1690  
Chicago, IL 60603  
Tel: (312) 263-7668  
Fax: (312) 263-7702  
jjennings@libertyjusticecenter.org  
dsuhr@libertyjusticecenter.org  
rstephens@libertyjusticecenter.org

/s/ Andrew P. Selman

Stacy L. Haney, Esq. (VSB 71054)  
Andrew P. Selman, Esq. (VSB 91060)  
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